

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
KELLEY AMADEI, et. al,

DECLARATION OF DARA A. OLDS
IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS

Plaintiffs,

- against -

KIRSTJEN M. NIELSEN, et al.

Civil Action No.
17-CV-5967
(Garaufis, J)
(Scanlon, M.J.)

Defendants.

-----X

Dara A. Olds, an attorney duly admitted to practice in the Eastern District of New York, declares pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am an Assistant United States Attorney, of counsel to Richard P. Donoghue, United States Attorney, Eastern District of New York, attorney for Defendants Kirstjen M. Nielsen, Secretary of Homeland Security; Kevin K. McAleenan, Acting Commissioner of U.S. Customs and Border Protection ("CBP"); Leon Hayward, Acting Director, CBP New York Field Operations; Francis J. Russo, CBP Port Director, John F. Kennedy International Airport, Port of Entry; Thomas Homan, Acting Director, U.S. Immigration and Customs Enforcement ("ICE"); Thomas Decker, Director, New York Field Office, Enforcement and Removal Operations, ICE; and David Jennings, Director, San Francisco Field Office, ICE. I submit this declaration to place the relevant documents on the record in support of Defendants' Motion to Dismiss.

2. Attached as Exhibit A is a true and correct copy of Plaintiffs' Responses to Defendants' First Set of Interrogatories (Responses to Interrogatory Nos. 6 and 7), and Verification of each Plaintiff.¹

Dated: Brooklyn, New York
April 20, 2018

RICHARD P. DONOGHUE
United States Attorney
Counsel for the Defendants

By: /s/ Dara A. Olds
DARA A. OLDS
Assistant United States Attorney
(718) 254-6148
dara.olds@usdoj.gov

¹ While Plaintiffs initially designated their responses to Defendants' First Set of Interrogatories "Confidential – Subject to Pending Protective Order," Plaintiffs have since agreed to remove that designation with respect to Plaintiffs' Responses to Interrogatory Nos. 3-13.